

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR Electric Company Standby Rates)	DTE 03-121
)	
)	

**PETITION OF WESTERN MASSACHUSETTS INDUSTRIAL CUSTOMERS GROUP
FOR LEAVE TO INTERVENE**

Now come General Electric Company, MeadWestvaco Corporation, and Solutia, Inc. (collectively the Western Massachusetts Industrial Customers Group "WMICIG") and hereby petition for leave to intervene in the proceeding docketed as DTE 03-121 concerning the design and application of standby electric tariffs for large and medium-sized commercial and industrial customers who have their own on-site, self-generation facilities by NSTAR Electric on behalf of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company (collectively "NSTAR"). The NSTAR filing proposes certain firm standby rates and indicates a willingness to provide non-firm standby service. WMICIG states as follows:

(1) The customers currently own or are considering the development of on-site self generation facilities that require or will require the purchase of firm or non-firm standby service from their local utility. Currently their local utility, Western Massachusetts Electric Company ("WMECO"), has a closed standby rate, Rate PR which is scheduled to expire on March 1, 2005. Unless WMECO adopts a standby rate any customer on the closed standby rate or customer contemplating installation of new self-generation currently must take service under the applicable full requirements rate. This proceeding will establish precedent and policy regarding standby rates which will have a direct impact on the members of WMICG.

(2) WMICIG and its members have participated in the Distributed Generation docket before the Department DTE 02-38 and have noted the need for reasonably designed cost-based standby rates. The customers have been permitted to intervene and have actively participated in numerous other rate filings of WMECo including without limitation the Electric Restructuring Filing in DTE 97-120. The customers have an ongoing interest in continuing its participation in the present proceeding. WMICIG submits that before the Department establishes any new policies or methods to establish standby rates for the NSTAR companies for existing or future customers seeking such service, each electric distribution company should be required to present information regarding the proposed format and any alternative format that they propose. Only with this type of information, including impacts on existing and future customers with on-site generation facilities can the Department establish a reasoned policy framework.

(3) The interests of the Industrial Customers are not adequately represented by the Attorney General, who represents primarily the interests of residential customers.

(4) The participation of WMICIG in this proceeding will including a full review of the design of the firm and non-firm standby rates, cross-examination of witnesses, filing comments and briefs.

WHEREFORE, WMICIG prays that the customers be permitted to intervene as a full intervenor or in the alternative as a limited participant.

Respectfully submitted,

GENERAL ELECTRIC COMPANY,
MEADWESTVACO CORPORATION,
SOLUTIA, INC.
by their attorneys,

Andrew J. Newman
Rubin and Rudman LLP
50 Rowes Wharf
Boston, MA 02110
617 – 330-7031

Date: February 2, 2004

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in these proceedings in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Procedure and Practice).

Andrew J. Newman

Date: February 2, 2004